

# MICROFILM DIVIDER

OMB/RECORDS MANAGEMENT DIVISION

SEN 2053 (2/85) 5M



ROLL NUMBER

DESCRIPTION

1214

2001 HOUSE FINANCE AND TAXATION

HB 1214

2001 HOUSE STANDING COMMITTEE MINUTES

BILL/RESOLUTION NO. HB 1214

House Finance and Taxation Committee

☐ Conference Committee

Hearing Date January 22, 2001

Tape Number	Side A	Side B	Meter #
1		X	5,338
Committee Clerk Signature <i>Janice Stein</i>			

Minutes:

**REP. AL CARLSON, CHAIRMAN** Opened the hearing.

**REP. BRYAN CLARK.** Introduced the bill to try to correct a problem which came to his attention at the request of someone from his district. The gentleman had purchased a computer which provided free internet service. The computer had two numbers to dial to access the internet, there was a local number and a long distance number. What happened, when the computer would dial the local number, it would be busy, so it would go to the long distance number. This whole time, the user did not know this computer was dialing the long distance number. A T and T noticed there was unusual activity on this account, so they sent twelve notices to US West (now Qwest), about this activity. When the bill came in December, it was extremely high, he called to see what happened, as he did not know what was going on. They all told him, he was not their account and it wasn't their responsibility. This legislation is suppose to make someone accountable. It is a shame that we have to introduce legislation to make

someone accountable for their responsibilities. This bill allows the phone companies to set their own policies to decide what is unusual high use, and then notify the customer.

**REP. NICHOLAS** Stated that some of the phone companies are already doing that, as he got a call from a phone company stating there were seventeen thousand minutes on his card, he thought all companies did that.

**MIKE TROTTER, FARGO**, Testified in support of the bill as he was the customer with the high computer account. It was the first time I ever had a computer, so I didn't know what was going on. I talked to the FCC, the Department of Commerce, the Public Service Commissioner, the Attorney General, there is no where for the average consumer to go. They were under no obligation to let me know that my bill was getting this high. It doesn't make any sense to me, when AT & T knows when the bill gets to four hundred forty dollars. One lady I talked to when I was dealing with this, said she gets four calls a week on this. I am not alone in this. Most people don't go to the steps I went to get this taken care of.

**REP. CARLSON** When you bought your computer, what came with the computer?

**MIKE TROTTER**, I took the computer over from my sister, she was going through a divorce and couldn't afford the payments, so I took it over. She had one hundred fifty three hours of internet service, the number that I was dialing I assumed was the number they had set aside, no matter where you called from, that was how I understood it, until I got my phone bill. I know I am partly responsible for it. I told AT & T and US West I would pay the four hundred and forty dollars or five hundred dollars when my second notice came out, because I am responsible for that number on my computer. There is no reason that the bill should have gotten to eighteen

hundred dollars. By the time the number was off of my computer, I can't remember what the last date of the billing cycle was.

**REP. CARLSON** Read the statement Mr. Trottier had received. When you got that five hundred dollar bill you could have called what their policy was.

**MIKE TROTTIER** If I was aware of the problem, if I am not aware of the problem how do I resolve it. There is one thousand dollars I could have saved, if they would have sent a notice in the mail, I wouldn't be here before you today.

**REP. DROVDAL** Apparently AT & T or U S West has a policy

**MIKE TROTTIER** They informed me they are not my local company so they were not responsible.

**REP. DROVDAL** Apparently they do have a policy to notify the name carrier of a termination that they have already sent for excessive uses, so what you are asking is that instead of notifying U S West, they should notify the end customer.

**MIKE TROTTIER** Or notify both of us. If they can send a notice one way, why can't they send it another way. They own the phone line, they can pick up the phone and call me.

**REP. CARLSON** Wouldn't you want to know about this policy before this happened?

**MIKE TROTTIER** I don't know how to answer that.

**REP. CLARK** Stated that currently there is no policy to notify the customer.

**MIKE TROTTIER** In ten years of having a phone, I have not spent one thousand dollars. Two months before this bill, my bill was \$38.01. This bill went to twenty three hundred dollars before I got through with this.

**REP. CLARK** Asked how long did it take to get the problem resolved?

**MIKE TROTTIER** Three months and about two hundred hours of my time. Every night I tried to get to someone, I went as far as going on Channel 4 News in Fargo, just to let people know, because I didn't have a clue as to what happened. I got out of the bill, it was taken care of because of how long I fought them. No one should have to fight them like that.

**REP. WINRICH** This bill is dated December 1, when did you receive the bill?

**MIKE TROTTIER** December 6, 2000

**REP. WINRICH** Do you know when AT & T notified U S West of unusual high usage?

**MIKE TROTTIER** Showed a statement which displayed date of notice and amount. See attached copy.

**TOM KELSCH, ATTORNEY REPRESENTING A T & T,** Testified in opposition of the bill because it is a mandate. See attached written testimony.

**REP. CLARK** There must have been a system in place when the first bill was sent, is that correct?

**TOM KELSCH** Yes, it was sent to the carrier.

**REP. DROYDAL** What kind of difficulty would AT & T run into instead of sending the notice to US West, send the notice instead to the consumer?

**TOM KELSCH** They have done that on some occasions, I have been informed, and in some instances, they get remarks back from customers wanting to know why they are monitoring them.

**REP. LLOYD** The only unreasonable that I think could have occurred here, is that he received ten notices of unusually high charges, how many notices would it take before AT & T decided there must be a problem that U S West has not taken care of?

**TOM KELSCH** I don't know that answer, I can try to find out. I don't think there is any particular policy.

**REP. LLOYD** Why would you send ten notices, why not respond on the first one.

**TOM KELSCH** Really, he is not our customer, for long distance he is, but not as far as the connection. As I understand, with the Gateway contract, you have two numbers, and if one number is busy, they will switch it. Obviously, he didn't read that part of the contract.

**REP. LLOYD** What type of communication does AT & T have with the provider like U S West, or Qwest?

**TOM KELSCH** They were giving notice in this particular case, but as I understand it, they do not have a policy where they are required to provide that kind of service.

**REP. WINRICH** I assume this particular case would have been caught under your usage monitoring.

**TOM KELSCH** This monitoring is done at random, two months later, it probably wouldn't have been noticed.

**REP. WINRICH** Your written testimony states that in certain cases, you have notified the customer, then it goes on to say that the notifications aren't always welcome by the customer. A moment ago, you indicated Mr. Trottler was not your customer.

**TOM KELSCH** He is our long distance customer.

**REP. DROVDAL** AT & T is a good corporation, I don't think anyone questions that and apparently, they have had this problem come up before, otherwise, they wouldn't have this random spiking. Does A T & T have any suggestions how we can deal with this?

**TOM KELSCH** First of all, in the definition, what should we do, unusual average, family average, what would you come up with, then would you take a percentage of it. The difficulty is ending up with a mandate to do it.

**REP. CLARK** Essentially, this bill allows you to set your own policy. You have tremendous latitude.

**DAVID CROUTHERS, NORTH DAKOTA ASSOCIATION OF TELEPHONE**

**COOPERATIVES**, Testified in opposition of the bill. See attached written testimony.

**REP. LLOYD** Why would they give ten notices and not notify the customer?

**DAVID CROUTHERS** We are talking about a relationship in Mr. Trotter's circumstance, which is a relationship between AT & T and U S West, I am not familiar how they do their business. If I had to guess, I would say computer letters out of the interchange at A T & T.

**REP. LLOYD** That relationship has been in existence since both companies were established in North Dakota, I would think there has to be some way that U S West would have responded to a customer.

**DAVID CROUTHERS** We have been with the independent companies in this state, U S West or Qwest, are distinct from ours, we work with a billing agent. Apparently, Qwest is the billing agent for A T & T, we don't do that in any way shape or form.

**REP. CLARK** You concluded your testimony by saying that requiring every interexchange company or billing agent to review the records of every single North Dakota would be a burden that would far exceed any conceivable benefit, I have to point out that this bill does not require you to monitor the account of every single customer, every single day. Basically, this legislation would require that if you have knowledge, in lines 10 and 11, of unusually high usage, you would



notify the customer. In this case, A T & T notified Qwest that this account was experiencing high activity. I am not exactly sure, where you are construing that this would require you to monitor every single account, every day.

**DAVID CROUTHERS** Stated that in line 7, it begins with a directive that each telecommunications interexchange shall develop a policy. If, may be a qualifier, I would fear that they would expect an interexchange company to comply with the provisions of this law. I am not familiar with any language or any statute that this body passes that you construe, if, to mean, if we don't really want to participate in the legislature's statutes. It is obvious, one could set a three million dollar limit for unusually high usage, and never have to worry about this bill. We do take the work of this body seriously. There are many mandates and requirements and so we don't take that, if, to mean merely voluntary.

**KENT BLICKENSDEFFER, QWEST CORPORATION,** Testified in opposition of the bill, See attached written testimony.

**ILONA JEFFCOAT-SACCO, PUBLIC SERVICE COMMISSION** Answered questions which the committee had. She stated that a Fargo to Bismarck call would be within the state's jurisdiction as intrastate. If the calls were interstate, then it would be a federal jurisdiction not a state jurisdiction.

**MARILYN FOSS, MCI WORLDCOM,** Testified in opposition of the bill, Stating that reviewing the bill, they did not understand the situation which prompted the bill was one of a customer engaging in voluntary uses of long distance usage and not understanding how this equipment operated. We were looking at this from the perspective where fraud was involved. It is important for you to know, that companies try to protect their customers against fraud. One of

the concerns we have with the bill, assuming that the companies were able to develop reasonable policies and did not, essentially, get themselves out of compliance with the law by establishing a threshold for unusual usage which made sure nobody would need a threshold. One of our concerns which hasn't been addressed is the concept that you disclose your threshold for unusually high usage to the public. That information should be proprietary. Once you make that public, you are actually encouraging the public for using the system for fraudulent purposes to make unauthorized calls.

**REP. SCHMIDT** With the technology we have, isn't there a way to have the computer to beep to inform us

**MARILYN FOSS** I would simply note, if you simply want to address the problem, this is not a telephone issue, it is a computer issue. With respect to other technology for monitoring, I think there is technology out there that may possibly be able to do anything. There is technology whereby they can monitor every phone call in the United States. There is no privacy. That is an inappropriate exercise of legislative judgment to say that because, if you are not worried about cost, about an individual's situation, that it should be done.

With no further testimony, the hearing was closed.

**COMMITTEE ACTION 1-23-01, Tape #2, Slide A, Meter # 5400**

Some of the committee members related experiences that have happened in their own families regarding long distance phone calls and computer internet services. They felt there is some problem, but felt it would be hard to correct it with this bill.

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House Finance and Taxation Committee

Bill/Resolution Number HB 1214

Hearing Date January 22, 2001

REP. HERBEL Made a motion for a **DO NOT PASS.**

REP. RENNERFELDT Second the motion. **MOTION CARRIED.**

10 YES      4 NO      1 ABSENT

REP. GROSZ Was given the floor assignment.

Date: 1-23-01  
Roll Call Vote #: 1

2001 HOUSE STANDING COMMITTEE ROLL CALL VOTES  
BILL/RESOLUTION NO. HB 1214

House FINANCE & TAXATION Committee

☐ Subcommittee on \_\_\_\_\_  
or  
☐ Conference Committee

Legislative Council Amendment Number \_\_\_\_\_

Action Taken Do Not Pass

Motion Made By Rep. Herbel Seconded By Rep. Rennerfeldt

Representatives	Yes	No	Representatives	Yes	No
CARLSON, AL, CHAIRMAN	✓		NICHOLAS, EUGENE	✓	
DROVDAL, DAVID, V-CHAIR	✓		RENNER, DENNIS	✓	
BRANDENBURG, MICHAEL	✓		RENNERFELDT, EARL	✓	
CLARK, BYRON		✓	SCHMIDT, ARLO	✓	
GROSZ, MICHAEL	✓		WIKENHEISER, RAY	✓	
HERBEL, GIL	✓		WINRICH, LONNY		✓
KELSH, SCOT		✓			
KROEBER, JOE		✓			
LLOYD, EDWARD	✓				

Total (Yes) 10 No 4

Absent 1

Floor Assignment Rep. Grosz

If the vote is on an amendment, briefly indicate intent:

**REPORT OF STANDING COMMITTEE (410)**  
January 23, 2001 4:45 p.m.

**Module No: HR-11-1481**  
**Carrier: Grosz**  
**Insert LC: . Title: .**

**REPORT OF STANDING COMMITTEE**

**HB 1214: Finance and Taxation Committee (Rep. Carlson, Chairman) recommends DO NOT PASS (10 YEAS, 4 NAYS, 1 ABSENT AND NOT VOTING). HB 1214 was placed on the Eleventh order on the calendar.**

2001 TESTIMONY

HB 1214

Submitted by Michael Trotter

**U S WEST**

www.uswest.com

MICHAEL TROTTER

Bill Date: Dec 1, 1999

Account No: 701 297-0872 437

Balance Forward	New Charges	Total Amount Due	Due Date for New Charges
\$ .00	\$1,804.09	\$1,804.09	Dec 22, 1999

## Account Summary

### ▼ Previous Balance

Charges		38.01
Payment	Thank you for your payment	38.01
Balance Forward		\$ .00

### ▼ New Charges

U S WEST	Billing	1-800-339-3921	38.01
	Sales and Service	1-800-244-1111	
AT&T		1-800-222-0300	1,766.08
Total New Charges			\$1,804.09

### For questions, call:

TOTAL AMOUNT DUE	\$1,804.09
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A late payment charge of 1.5% may apply if amount due does not reach us by Jan 1, 2000.

Save with the U S WEST e-card Platinum Visa, whether you shop online or off. No annual fee, 2.9% Intro APR with a balance transfer, going to 12.99% APR thereafter. Risk-free online shopping, plus 5% cash back from participating online merchants. To apply, call 1-800-942-6043.

U S WEST, PO Box 1301, Minneapolis, MN 55483-0001

Visit us 24 hours a day at [www.uswest.com](http://www.uswest.com).

HB 1214

Testimony of Thomas F. Kelsch  
On Behalf of AT&T Corp.

Before the House Finance and Taxation Committee

North Dakota Legislature  
January 22, 2001



Good morning Mr. Chairman, and members of the Committee.

My name is Thomas F. Kelsch, and I represent AT&T Corp. Thank you for this opportunity to express AT&T's concerns relating to HB 1214.

AT&T is driven to provide the highest quality, most reliable and secure telecommunications services to our customers throughout the United States and abroad. We are extremely proud of our track record in this regard, but we also realize that as the leader in telecommunications services we have a continuing responsibility to be innovative: to provide new services and to make continuous improvements to our existing services.

We understand that HB 1214 is intended to address a situation in which an internet user inadvertently incurs unusually high long distance charges, unaware that he or she is not using a local, non-toll access number for the connection. This legislation would require the long distance carrier first to define "unusually high usage" and then to provide written warning to a customer within twenty-four hours of the occurrence of such "unusually high usage."

AT&T believes that, while HB 1214 has been proposed with the very best of intentions, it will not solve the problem it is intended to address, and it contains several additional problems which make the attempted cure worse than the disease.

First of all, as a matter of background, you should know that AT&T has attempted in the past to establish guidelines for monitoring certain kinds of "unusually high usage," primarily in order to combat fraud. We have attempted to monitor unusual calling patterns from PBXs, or on calling cards. We have attempted to flag calls made to specific area codes, where a disproportionate percentage of fraudulent calls are being terminated. And we have attempted to track "usage spikes," in which billed amounts for a particular customer have suddenly and dramatically increased.

The end result of these efforts has, at best, been mixed. Sometimes we have successfully detected fraudulent activity. And in those cases, where we have notified the customer, the results have been very positive, both for AT&T and for the customer. But in many other instances, we have simply stumbled upon a customer who finds himself or herself in unusual circumstances. Usage spikes can be caused by a variety of things: an illness in the family, a new baby, a freshman away at college, a new business or personal relationship. And frequently, in the middle of those unusual circumstances, a notification or other inquiry from AT&T is not welcomed by the customer. In fact, it can be viewed as intrusive and paternalistic.

So the first point I would make here is that unusually high usage does not always mean that there is a problem which AT&T—or any other carrier—can or should address.

Secondly, it is one thing for AT&T to attempt to improve customer service by highlighting usage spikes or checking with the customer about unusually long or frequent

calling card calls made, for example, to the Dominican Republic. But it is entirely different for the government to mandate such oversight. Does the State of North Dakota want to be in the forefront of an effort to *require* companies to check up on a citizen's calling patterns? Or will this be viewed by some—irrespective of the good intentions behind the bill—as one step closer to Big Brother?

Third, the very definition of "unusually high usage" will create numerous problems for carriers. Can a carrier legitimately set the definition at a particular dollar amount? Must there be a rolling average calculated for each customer? If so, then what percentage above that average will constitute "unusually high usage?" Where to draw the line? Despite the fact that AT&T has some experience in this area, I must tell you that the company is not at all certain how to comply with the language of HB 1214. Nor have we been able to calculate the costs of compliance.

Fourth, a written notification will likely be ineffective in managing usage spikes. Assuming for example that the required letter is received by the customer within four or five days after the carrier sends it, the spike will likely continue during that delivery time. Additionally, the fact that a customer has received such a notification doesn't mean that the customer will know how to prevent a continuation of that spike. As I indicated previously, unusually high usage can be a result of any number of legitimate factors. Will the customer associate the notification with any one specific factor? Assuming that the spike has in fact been caused by an internet connection, will the customer recognize that as the cause? The customer will likely contact the carrier, who may or may not be able to resolve the problem—assuming once again that a problem actually exists.

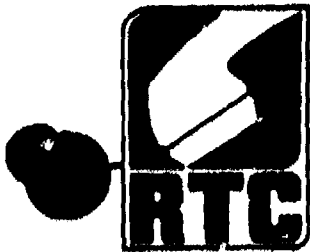
Fifth and finally, it appears clear that the situation which HB 1214 attempts to address has very little to do with fraud, and everything to do with understanding the technology which is being used. We are all on a steep learning curve as the result of burgeoning new technology and a multitude of new and exciting applications. To say that we are experiencing growing pains from the process would be a horrendous understatement. Sometimes the so-called advantages of this technology boom are completely overshadowed by the frustration of an inordinately steep learning curve.

But legislation is not the answer, and will not lessen the angle of that learning curve.

For all of these reasons AT&T opposes passage of HB 1214, and urges a "no" vote from this Committee.

Mr. Chairman, this concludes my prepared remarks. I would be pleased to answer any questions you or the other members of the Committee may have. Thank you.

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## NORTH DAKOTA ASSOCIATION OF TELEPHONE COOPERATIVES

Box 1144 · Mandan, ND 58554  
Phone 701-663-1099 · FAX 701-663-0707

### HOUSE BILL 1214

### HOUSE FINANCE AND TAXATION COMMITTEE

JANUARY 22, 2001

### DAVID CROTHERS NORTH DAKOTA ASSOCIATION OF TELEPHONE COOPERATIVES

My name is David Crothers from the North Dakota Association of Telephone Cooperatives. The Association represents all of the cooperative and independent telephone companies in the State. Those companies serve over 150,000 homes and small businesses and 90 percent of the geographic territory of North Dakota.

In addition to providing local service, as well as a host of other telecommunications products, members of North Dakota's independent telephone industry also offer long distance services.

Members of the Association believe that passage of HB 1214 would be administratively difficult, raise telecommunications costs for all of our customers and, in many instances, create a statute that is impossible to comply with.

It appears to the Association that HB 1214 has five elements. It requires:

- 1-Interexchange companies to develop a policy that defines unusually high usage;
- 2-Interexchange carriers to inform a customer by written notice of unusually high usage if the carrier has knowledge of that usage;
- 3-If an interexchange carrier provides notice of unusually high usage to that carrier's agent for billing or for any other purpose, the carrier shall provide written notice to the customer;
- 4-The interexchange company to send written notice of the unusually high usage to the customer within 24 hours; and

5-The interexchange carrier is responsible for charges incurred by the customer if it fails to develop a policy or does not notifying the customer within the timeframe.

The first element, a requirement that interexchange companies develop a policy on "unusually high usage" is problematic in that it does not define whether that usage is by time or dollar amount.

Far more onerous, however, is the "unusually high usage" standard will need to be specifically tailored for each individual account. Twenty percent of our customers have virtually no long distance calls on their telephone bills each month. Others spend in excess of a thousand dollars, while the majority fall in between. Fifteen dollars in toll charges would constitute "unusually high usage" for some, although \$500 in charges would be low for others. The Association believes that each customer account would have to be manually reviewed and a judgement made by telephone company employees on what constitutes excessive use of a customer's telephone line.

To illustrate, North Dakota Long Distance, through which 11 independent telephone companies offer long distance, has 36,000 interLATA customers and 38,000 intraLATA customers. Souris River Telecommunications in Minot has in excess of 12,000 customers. Consolidated Telcom in Dickinson and West River Telecommunications Cooperative in Hazen also provide interexchange telecommunications service. Reviewing each customer account and setting a cap for each customer would be highly labor intensive with no assurance that the cap that we set on a customer's account will be accurate. Also, the costs will inevitably be passed on to the customer.

Second, HB 1214 requires the interexchange company to tell the customer if the carrier has knowledge of unusually high usage. While the word "if" would appear to serve as a qualifier, it also has the potential to make the legislation unworkable from conception.

There are over 400 long distance telephone companies permitted to offer interexchange services in North Dakota, but the Association believes that only two of them are facility-based and over 95 percent are resellers of long distance. In many instances, the interexchange company selling those minutes that it acquires from the wholesaler or underlying carrier has no information on the usage of its customers.

For example, North Dakota Long Distance is the interexchange company. It purchases a block of minutes from a company called Global Crossing. When a customer makes a call it travels along the Global Crossing network. At the conclusion of that call,

Global Crossing measures the originating number of the call, the terminating number of the call, the length of the call, the wholesale rate, the time of day and the date of the call.

At the end of each day Global Crossing sends that information to National Information Solutions Cooperative (NISC) in Mandan to convert to the North Dakota Long Distance format. The information is stored in NISC's databases until the end of the billing cycle and prior to sending the bill to the customer.

The problem with complying with the requirement of notifying the customer is that the interexchange carrier (N.D. Long Distance) is never in possession of the information. Global Crossing measures the call and forwards it to the billing agent (NISC).

Similarly, the third element of HB 1214, which begins at the end of line 11, states:

"In addition, if an interexchange telecommunications carrier provides notice of unusually high usage to that carrier's agent for billing or for any other purpose, the carrier shall provide written notice to the customer."

The Association believes there is a fundamental misunderstanding of the telecommunications industry within this provision of the legislation.

If the word "carrier" in the last half of Line 13 refers to the interexchange telecommunications carrier serving the customer it is redundant with the second element of HB 1214. If it is assumed that a long distance company's agent for billing is a local exchange carrier that would be incorrect in the independent telephone industry.

As was noted earlier, the wholesale provider of minutes transfers all of the usage to National Information Solutions Cooperative (NISC) in Mandan for processing. That is common practice for the 1,000+ independent telephone companies in the United States. NISC, for example, provides rating and other billing services for 57 telephone companies in 26 states.

That organization has entered into contracts with local exchange companies throughout the State of North Dakota to do their billing for them. The information is collected throughout the month and processed prior to the end of the billing cycle and then sent to that local exchange customer. The bill the customer receives from NISC includes long distance charges, the monthly service charge and charges for any other services the customer subscribes to. The local independent telephone company, which the Association believes is the "carrier" referred to in the second half of line 13, does not see the bill or the charges until it is sent to the customer. As the vast majority of

interexchange companies do business today, it would be impossible to comply with HB 1214.

The fourth element requires the interexchange carrier to send written notice to the customer within 24 hours. Once again, the interexchange company does not have the information that would allow it to comply with the statute. That information is sent to the billing agent.

Additionally, a number of long distance wholesalers only supply those "call detail records" (CDRs) on a weekly basis to the billing agents.

The fifth element of HB 1214 requires that the long distance company to be responsible for the customer's charges if the provisions of the legislation are violated. Once again, the Association believes that it is impossible in some instances or extremely expensive in order to comply with this legislation.

The Association believes that every long distance customer in the State of North Dakota will incur increased costs if HB 1214 is adopted. We also believe that requiring every interexchange company billing agent to review the records of every single North Dakota customer every single day will be a burden that far exceeds any conceivable benefit.

Members of the Association urge a Do Not Pass on HB 1214.

## **House Bill 1214**

**Presented by:**     **Kent Blickensderfer**  
                             **Qwest Corporation**

**Before:**             **House Finance and Taxation Committee**  
                             **Representative Al Carlson, Chairman**

**Date:**                **January 22, 2001**

- Qwest opposes HB1214 because it creates further unnecessary regulation on competitive services.
- The FCC has jurisdiction over interstate services. This legislation would only affect intrastate toll services, which were likely not the impetus for this bill.
- If North Dakota was to enact this legislation, there are over 400 different companies registered with the PSC to provide telecommunications services in the state. That could mean 400 different policies regarding unusually high usage.
- How do you define unusually high usage? Toll usage is highly individual to each customer's needs. What may seem excessive for one customer would be normal for another. Some customers may even find these notices intrusive.
- As a billing agent and carrier, Qwest has processes in place to flag accounts and notify customers based upon credit history and risk analysis. We also have a process for customers to contact us and review their toll history.
- This bill, though well intended, may have the effect of creating an excessive burden on companies providing these services.
- Further, because of the language contained in line 15 and 16, bad actors may have an incentive to run up excessive toll charges and then challenge them based upon a failure to meet the 24 hour notice requirement.
- Questions?